



SENECA NATION OF INDIANS
COMMUNITY PLANNING & DEVELOPMENT DEPARTMENT

ALLEGANY OFFICE

PO Box 231
Salamanca, NY 14779
Phone: 716/945-1790
Fax: 716/945-6487

CATTARAUGUS OFFICE

12837 Route 438
Irving, NY 14081
Phone: 716/532-4900
Fax: 716/532-5443

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FCC Headquarters
445 12th St. SW
Room TW-A325
Washington, DC 20554

RE: Connected Care Pilot Program Comment

The Seneca Nation would like to provide the following comments to be considered for the Connected Care Pilot Program application and scoring criteria. The Nation recently submitted an application under the USDA ReConnects grant program and as a result we have developed the list below to be considered with the development of this application and program. Specifically the comments below are in regards to #40. *Application Process* and #46. *Evaluation of Proposals and Selection of Projects*.

- A fair amount of points should be included for serving Tribal Lands. Points should be awarded if the fiber broadband network is proposing to serve 80%-90% of Tribal Lands.
- Don't require letters from Governor's or other state officials. Often this puts Native American communities at a disadvantage.
- Don't require permitting outside what would otherwise be required for individual Nation's per Treaty rights or other individual Native Nation agreements.
- Offer preference to Substantially Underserved Trust Areas (SUTA).
- Offer preference to Tribal Lands that have been omitted from other state broadband funding opportunities.
- Honor Tribal Historical Preservation Office's determinations as an equivalent to State Historical Preservation Office where required.
- The Seneca Nation knows that the FCC data listed is incorrect regarding companies that claim to serve our Territory. Disregard this data when making funding opportunities as it is not fair to disqualify or dock Native Nation's when the FCC has acknowledged that companies have been making false claims regarding serving particular census blocks.
- Our experience with the Re-Connect scoring criteria they gave significant weight population density served. When you are working with Native/Tribal Nations this number can be misleading and not necessarily a good reflection of true rural conditions of a territory or reservations. There is limited land bases in which Native Americans live in order to live within their community; however, their community may still have significant rural qualities, limited food, services and agencies within that small area.

Sincerely,

Paula Pichon

Paula Pichon
Grants Manager
Seneca Nation
716-532-4900 ext. 5029